

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO.: 3:21-cr-00359-PAD-MEL

v.

JOSE JULIO RODRIGUEZ-CUMBA,
et. al.,

Defendant(s).

JOINT INFORMATIVE MOTION

TO THE HONORABLE PEDRO A. DELGADO-HERNANDEZ
U.S. DISTRICT COURT JUDGE
FOR THE DISTRICT OF PUERTO RICO

COME NOW the parties, which very respectfully state, allege and pray as follows:

1. On October 28, 2021, this Honorable Court ordered the parties to inform of the status of the case. (D.E. #35).
2. To date, parties are awaiting this Honorable Court's ruling on Defendant Cumba's Motion for Reconsideration for Bond and to Reopen Bail Hearing. (D.E #40)

3. To date, there are several outstanding co-defendant's that have not been arrested.

4. The parties are still reviewing and investigating the voluminous discovery provided. The parties intend to send some discovery request to the government shortly regarding potentially discoverable items. Due to the copious amount of discovery, the delays endured in investigating this matter as a result of COVID-19 pandemic [with additional variants], the strain of completing the discovery process will not be finalized for some time.

5. Based on the foregoing reasons, undersigned counsels respectfully request this Honorable Court allot them sixty (60) through ninety (90) days to provide an updated status via conference call, Zoom, or any manner in which this Court would instruct.

WHEREFORE, it is respectfully requested that this Honorable Court takes notice of the above-mentioned information.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this, I electronically filed the present pleading with the Clerk of the Court using the CM/ECF system, which will send electronic notification of said filing to all parties of record.

Respectfully submitted,

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